

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

KIRBY VANCE BROWNING,

Plaintiff,

v.

MICHAEL AMES, DAVID LIBBY,
ALFRED A. GRAY, JR., and ROBERT F.
KENNEDY COMMUNITY ALLIANCE,
INC.,

Defendants.

CIVIL ACTION NO.: 4:25-cv-40025-DHH

MOTION OF DEFENDANT ALFRED A. GRAY, JR. TO DISMISS

Pursuant to Fed. Rules Civ. P. 12(b)(2), (5) and (6), the Defendant Attorney Alfred A. Gray, Jr. moves to dismiss all counts of the complaint against him. Attorney Gray has not been served, and the complaint fails to state a claim upon which relief can be granted. For these reasons and the reasons given in Attorney Gray's accompanying memorandum, the Court should dismiss the complaint with prejudice.

Dated: September 12, 2025

ALFRED A. GRAY, JR.,
By his attorneys,

/s/ John J. O'Connor

John J. O'Connor

BBO #555251

Matthew T. Westhoff

BBO #711741

Peabody & Arnold LLP

Federal Reserve Plaza

600 Atlantic Avenue

Boston, MA 02210

Telephone No.: (617) 951-2077

joconnor@peabodyarnold.com

mwesthoff@peabodyarnold.com

CERTIFICATE OF COMPLIANCE

I, John J. O'Connor, certify that I have communicated with the Plaintiff in compliance with Local Rule 7.1.

/s/ John J. O'Connor
John J. O'Connor

CERTIFICATE OF SERVICE

I hereby certify that on September 12, 2025, a true and correct copy of the foregoing was filed electronically in the Court's CM/ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's Case Management/Electronic Case Filing system, and via U.S. Regular Mail to the plaintiff, as follows:

Kirby Vance Browning (*pro se*)
401 Flint Avenue, Apt. 216
Albany, GA 31701
kirbyvbrowning@gmail.com

/s/ John J. O'Connor
John J. O'Connor, Esq.

4157937